

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

AVR GROUP, LLC, TRIDENT ASSET  
MANAGEMENT, INC., MICHAEL  
DZIURGOT, individually and as the  
representatives of a class of similarly-situated  
persons,

Plaintiffs,

vs.

ALEBRIJE ENTERTAINMENT, LLC,  
CRAIG COLE, MATTHEW COLE,  
GUSTAVO MONTAUDON, and John Does  
1-10,

Defendants.

Case No. 1:24-cv-20755

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**REQUEST FOR JUDICIAL NOTICE**

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Defendant, Matthew Cole, hereby requests that the Court take judicial notice of the documents attached hereto as Exhibits 1 - 3 pursuant to Federal Rule of Evidence 201. This request is made in support of the *Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and Failure to State a Claim for Relief* filed contemporaneously herewith.

**Exhibit 1:** Attached as Exhibit "1" is a true and correct copy of the Second Amended Complaint in the U.S. District Court, Northern District of California, Case No.: 23-cv-00287-VC, *AVR Group v. SAC Advisory Group, LLC*. Federal Rule of Evidence 201 permits Judicial Notice of this Complaint.

**Exhibit 2:** Attached as Exhibit “2” is a true and correct copy of the Second Amended Complaint in the U.S. District Court, Northern District of Illinois, Case No.: 21-cv-01867, *Aronson v. JJMT Capital, LLC*. Federal Rule of Evidence 201 permits Judicial Notice of this Complaint.

**Exhibit 3:** Attached as Exhibit “3” is a true and correct copy of the Order on Appointment of a Permanent Receiver enter in the U.S. District Court, Central District of California, Case No.: 2:21-cv-02927, *S.E.C. v. Zachary J. Horowitz and InMM Capital, LLC*. Federal Rule of Evidence 201 permits Judicial Notice of this Complaint.

Respectfully submitted,

/s/ Michael J. Harwin

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